REMARKS

Claims 1-25 are pending in the application and stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,748,974 to Johnson in view of U.S. Patent No. 6,125,347 to Cote. Applicants respectfully request reconsideration of the claim rejections based on the above amendments and following remarks.

Applicants submit that at the very least, claims 1, 10 and 19 are patentable and non-obvious over the combination of Johnson and Cote. In particular, the combination of Johnson and Cote does not disclose or suggest, for example, maintaining a multi-modal history of events that result from user interaction with one or more user applications of a multi-modal computing system, *wherein the events are maintained in chronological order, and wherein the events are linked by event type, wherein an event type includes a change of dialog focus,* much less a dialog manager that determines a target of the speech command/event by using the multi-modal history of events to determine a current context of a speech input event/command, as essentially claimed in claims 1, 10 and 19.

To begin, it is acknowledged on page 4 of the Office Action that Johnson does not specifically disclose a dialog manager determining a current context of a command by reviewing a multi-modal history of events. It is respectfully submitted that Cote does not cure the deficiencies of Johnson in this regard. Cote discloses (FIG. 1) a speech recognition system (45) that creates a separate recognition history database (67, 68, and 69) for each active application to store a history of recognition outputs sent to the respective active applications (see, Col. 15, lines 1-8). As depicted in FIG. 3, Cote's speech recognition system comprises a text event subsystem (55) that inputs a translated text to a user application (see, Col. 5, lines 5-10). However, Cote does not specifically disclose how the text event subsystem (55) determines

a target application. Indeed, at the very least, <u>Cote</u> does <u>not</u> disclose using the history databases (67, 68, 69) to determine the current context of a speech command to identify a target. In fact, <u>Cote</u> specifically discloses using the history database of a given application to undo the effect of a previous recognition output provided to the given user application (see, e.g., Col. 15, lines 9-14). Thus, <u>Cote</u> does <u>not</u> disclose a dialog manager that determines a target of the speech command/event by using the multi-modal history of events, as essentially claimed in claims 1, 10 and 19.
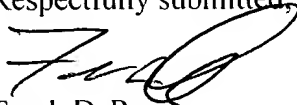
Furthermore, although <u>Cote</u> discloses separate event histories for active applications, <u>Cote</u> does not disclose a multi-modal history of events that maintains events generated by user interaction with one or more applications of the computing system, *wherein the events are maintained in chronological order, and wherein the events are linked by event type, wherein an event type includes a change of dialog focus.* In other words, <u>Cote</u> does not disclose a multi-modal history in which change of dialog focus events are recorded, much less a history in which <u>change of dialog focus events are linked</u>. Indeed, <u>Cote</u> teaches the use of separately maintained application text event history databases.

The Examiner cites Col. 7, line 9 to Col. 9, line 53 of <u>Cote</u> as disclosing text events being linked by chronological and hierarchical relationships. However, these links are between input events in the history database for <u>a given application and not between text events in history databases of other applications</u>. In any event, Examiner has not specifically shown where and how <u>Cote</u> discloses recording change of dialog events.

Accordingly, for at least the above reasons, claims 1, 10 and 19 are patentable over the combination of <u>Johnson</u> and <u>Cote.</u> Further, all pending dependent claims are nonobvious and patentable over such combination at least for the reasons given above for respective base claims

9

1, 10 and 19. Accordingly, the withdrawal of all the rejections under 35 U.S.C. §103(a) is

respectfully requested.

Respectfully submitted,

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